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8 *Representing the United States of America*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 United States of America,

13 Plaintiff,

14 vs.

15 Edward Charles Wright,

16 Defendant.

3:19-CR-00012-MMD-WGC

**UNITED STATES' MOTION TO  
SEAL AND SEALING ORDER  
[PROPOSED]**

17  
18 The government respectfully moves the Court for an order sealing the corresponding  
19 Stipulation for Protective Order Regarding Confidential Records, Protective Order [Proposed]  
20 Regarding Confidential Records, this Motion, and any corresponding Order issued by this  
21 Honorable Court, be sealed,

22 / / /

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24 / / /

1 given that the stipulation and proposed protective order contain confidential records that may be  
2 deemed sensitive.

3 DATED this 18<sup>th</sup> day of March, 2020

4 . Respectfully submitted,

5 NICHOLAS A. TRUTANICH  
6 United States Attorney

7 /s/ Randolph J. St. Clair  
8 RANDOLPH J. ST. CLAIR  
9 Assistant United States Attorney  
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DATED this 18th day of March, 2020.

HON. MIRANDA M. DU  
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 It is hereby certified that pursuant to LCR 47-4 service of the foregoing **UNITED**  
3 **STATES' MOTION TO SEAL AND SEALING ORDER [PROPOSED]** shall be served on  
4 counsel for defendant via email to the following:

5 Chris Frey  
6 [chris\\_frey@fd.org](mailto:chris_frey@fd.org)

7 Dated this 18<sup>th</sup> day of March, 2020

8 /s/ Randolph J. St. Clair  
9 RANDOLPH J. ST. CLAIR  
10 Assistant United States Attorney  
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